

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
Tristan Taveras, *on behalf of himself and others*
similarly situated in the proposed FLSA
Collective Action,

Case No.: 22-cv-03416-HG

Plaintiff,

NOTICE OF MOTION

- against -

Value Service & Repair Corp., Value Service
Corp., Yuval, Inc., Steven Bach, and Susan Bach,

Defendants.
-----X

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated October 6, 2022, together with the supporting declaration of Jason Mizrahi, Esq. and the exhibits annexed thereto, Plaintiff Tristan Taveras (“Plaintiff”), by and through the undersigned counsel, Levin-Epstein & Associates, P.C., will move this Court, the Honorable Judge Hector Gonzalez presiding, at the United States District Court of the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, at a date and time set by the Court, for an order: (i) entering default judgment against Defendants Value Service & Repair Corp., Value service Corp., Yuval, Inc. (together, the “Corporate Defendants”), and Steven Bach, and Susan Bach (together the “Individual Defendants”, and together with the Corporate Defendants, the “Defendants”), pursuant to Federal Rule of Civil Procedure (“Fed.R.Civ.P.”) 55(b) in the amount of \$304,080.26; (ii) awarding prejudgment interest on Plaintiff’s unpaid wages award of \$129,480.00 until the day final judgment is entered against Defendants; (iii) together with such other relief as this Court deems just and proper;

PLEASE TAKE FURTHER NOTICE that answering and reply papers, if any, must be served by such date that the Court may order.

Dated: New York, New York
October 6, 2022

By: /s/ Jason Mizrahi
Jason Mizrahi, Esq.
Joshua D. Levin-Epstein, Esq.
Levin Epstein & Associates, P.C.
60 East 42nd Street, Suite 4700
New York, NY 10165
Telephone: (212) 792-0048
Email: jason@levinepstein.com
Attorneys for Plaintiff

Cc: All parties via ECF